UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JEREMY BALES CREATIVE LLC

        Plaintiff,

-against-

BC HOSPITALITY GROUP LLC

        Defendant.

ECF Case

Civil Action No. 1:20-cv-01356-ER

Notice of Settlement and Joint Motion to Stay

Plaintiff Jeremy Bales Creative, LLC and Defendant BC Hospitality Group, LLC have reached an agreement to settle the above-captioned matter and therefore respectfully request that this Court stay all contemplated proceedings pending final dismissal. In support of this joint motion, the parties state as follows:

1. Plaintiff filed this action for copyright infringement on February 16, 2020. Counsel for Defendant agreed to accept service on behalf of Defendant, and the parties have agreed to a settlement of the claims herein.

2. Due to complications arising from the current pandemic, the parties have been unable to immediately complete their obligations under the settlement agreement.

3. Performance of the parties' obligations under the settlement agreement is expected to be completed in October, 2020.

4. To date, the Court has not scheduled any proceedings or issued a case management order.

In view of the foregoing, the parties respectfully request that this Court refrain from issuing a case management order or otherwise expending resources on this matter until at least October 31, 2020. In the event that the parties' obligations under the settlement agreement are completed prior to that date, the parties will promptly file a dismissal, obviating the need for further action.

Respectfully Submitted this 18th day of May, 2020.

/s/ Nicholas Ranallo	*/s/Claire E. Wells Hanson*
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